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Attorneys for Defendant,
 Hyperkin, Inc.

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

ATARI INTERACTIVE, INC.,)	Case No. 2:19-CV-0608-CAS (AFMx)
Plaintiff,)	Hon. Christina A. Snyder
)	
v.)	JOINT STIPULATION
)	REQUESTING CONTINUANCE OF
HYPERKIN INC.,)	TRIAL AND PRETRIAL
)	DEADLINES
Defendant.)	
)	
)	
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Plaintiff Atari Interactive, Inc., by and through its counsel of record, and
 Defendant Hyperkin, Inc., by through its counsel of record (collectively “the
 Parties”), hereby stipulate and agree as follows:

1 WHEREAS, on May 13, 2019 the Court ordered that the trial in the above-
2 captioned case be set for July 28, 2020, pretrial conference for June 15, 2020, and
3 last day to file dispositive motions on April 10, 2020;
4

5 WHEREAS, on February 26, 2020, the Court granted the Parties' request to
6 continue the last day to file dispositive motions to April 17, 2020;
7

8 WHEREAS, the Parties have worked diligently to complete discovery and
9 meet the Court's deadlines;
10

11 WHEREAS, Hyperkin intends to file a motion for summary judgment
12 and/or partial summary judgment;
13

14 WHEREAS, the Parties believe that to allow ample time to fully cover the
15 facts in this case, an additional week to file their opposition and reply to the
16 motion is necessary;
17

18 WHEREAS, due to the coronavirus pandemic, the Parties also believe that
19 the motion may not be heard or decided until after pretrial documents are due;
20

21 WHEREAS, the Parties believe that a three (3) month continuance of the
22 trial and related dates is necessary and desirable to ensure adequate time to have
23 the motion heard and decided, possibly narrowing the issues or clarifying the
24 scope of the lawsuit, before having to engage in trial preparation work;
25

26 WHEREAS, Plaintiff's counsel have trials in June, August, and September;
27

28 NOW, THEREFORE, the Parties hereby stipulate, agree, and respectfully

request that the Court modify the schedule as follows:

<u>Deadline</u>	<u>Original Date</u>	<u>New Date</u>
Last Day to File Dispositive Motions	April 17, 2020	June 1, 2020
Motions in Limine Due	May 18, 2020	August 17, 2020
Pretrial Conference/Hearing on Motions in Limine	June 15, 2020	September 14, 2020
Jury Trial	July 28, 2020	October 27, 2020

IT IS SO STIPULATED.

Dated: April 8, 2020

BROWNE GEORGE ROSS LLP
Keith J. Wesley
Milin Chun
Matthew Venezia

By: /s/ Milin Chun
Milin Chun

Attorneys for Plaintiff
ATARI INTERACTIVE, INC.

Dated: April 8, 2020

The Law Office of Mary Sun

By: /s/ Jason Chuan
Jason Chuan

Attorneys for Defendant
HYPERKIN, INC.

Attestation of Concurrence in Filing

Pursuant to L.R. 5-4.3.4(a)(2)(i), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: April 8, 2020

/s/ Jason Chuan
Jason Chuan
Attorneys for Defendant
Hyperkin, Inc.

CERTIFICATE OF SERVICE

I am a citizen of the United States of America and I am employed in Arcadia, California. I am over the age of 18 and not a party to the within action. My business address is 128 E. Huntington Drive, Suite B, Arcadia, CA 91006.

On April 8, 2020, I served **JOINT STIPULATION REQUESTING CONTINUANCE OF TRIAL AND PRETRIAL DEADLINES** on counsel for Atari Interactive, Inc. via ECF.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on April 8, 2020, at Arcadia, California.

/s/ Jason Chuan

Jason Chuan